

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

JESSE PAUL SKINNER, and all similarly situated	X
Plaintiffs	x
V.	X CIVIL ACTION No. 9:18-cv-139
BRYAN COLLIER	X <u>DEMAND FOR JURY TRIAL</u>
MATT GROSS	X
BILLY LEWIS	X
BRUCE JOHNSON	X
KENNETH HUTTO	X
JAMES KENT	X
BLAKE NORMAN	X
JEQUILLE REED	X
GEORGE JANSKY, JR	X
KRYSTEL HOHENBRINK	X
SAMUEL DOMINEY	X
CORA SIMS	X
KENNETH RAGLAND	X
JUSTIN MCKIGHT	X
ALVIN PERRY	X
JOHN STUBBLEFIELD, and	X
TEXAS DEPARTMENT OF CRIMINAL JUSTICE	X
Defendants	X
	X

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
DEC 26 2018
BY
DEPUTY

PLAINTIFF'S MOTION FOR LEAVE TO FILE
AN AMENDED COMPLAINT

Plaintiff, Jesse Paul Skinner, pro se, pursuant to Rule 15(a) and 19(a) Federal Rule of Civil Procedures, requests leave to file an Amended Complaint adding parties.

1. The Plaintiff in his original complaint did not name these defendants to the complaint due to the delay by the Defendants in resolving the institutions grievance procedure. See attached (Step-two grievance No. 2018143333, marked as (Exhibit #1))

against Defendants Kenneth Ragland.Lt,Justin McKight.Sgt,Alvin Perry.Sgt, and Defendant John Stubblefield.Captain in grievance No. 2018095001.

2. The Plaintiff's complaint in paragraph-section (I) Retaliation, reflect the actions of Defendants Kenneth Ragland,Justin McKight,Alvin Perry,all sued in their Individual Capacity.

3. The Plaintiff's complaint in paragraphs-sections (I) and (J) Retaliation and Equal Protection Violations reflect the actions of Defendant John Stubblefield,sued in his Official Capacity.

4. The Plaintiff make the **Demand For Jury Trial** at this time in amending the complaint.

5. This Honorable Court should grant leave freely to amend a complaint. Foman V. Davis, 371 U.S. 178,182 (1962).

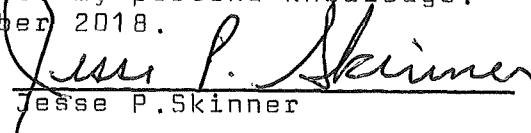
WHEREFORE, Plaintiff prays that this Honorable Court grant his requests to Amend his Complaint to add Defendants and request for Jury Demand.

RESPECTFULLY SUBMITTED,



Jesse Skinner, Pro se
TDCJ #599362/Eastham
2665 Prison Rd.#1
Lovelady, Texas 75851

28 USCA § 1746,
42 I declare under penalty of perjury that the foregoing are true and correct to my personal knowledge.
Executed on this 17th of December 2018.


Jesse P. Skinner



Texas Department of Criminal Justice
STEP 2 OFFENDER
GRIEVANCE FORM

Offender Name: MR. Jesse P. Skinner TDCJ # 599362

Unit: Eastham-09 Housing Assignment: D-2-3 P-3-12

Unit where incident occurred: Eastham09

Appealing Grievance No. 2018143333/Code 815

OFFICE USE ONLY	
Grievance # <u>2018143333</u>	
UGI Recd Date: <u>JUN 19 2018</u>	
HQ Recd Date: <u>JUN 22 2018</u>	
Date Due: <u>7.29</u>	
Grievance Code: <u>815</u>	
Investigator ID#: <u>IT364</u>	
Extension Date: <u>09.07</u>	

You must attach the completed Step 1 Grievance that has been signed by the Warden for your Step 2 appeal to be accepted. You may not appeal to Step 2 with a Step 1 that has been returned unprocessed.

Give reason for appeal (Be Specific). I am dissatisfied with the response at Step 1 because...

I am dissatisfied with the response of the step one grievance because:

1. The Warden failed to file this complaint with the (TDCJ-CID) Risk Management pertaining to my complaint of unsafe act by the parties mentioned in this grievance.

2. This grievance is not a complaint against the conditions of confinement as documented under the grievance Code 815. This is a (Safety Issue-526) and a(Americans with Disabilities Act-004) claim that all parties failed to make or provide the appropriate accommodations for individuals with lifting, walking, standing,bending,performing manual tasks,working, and with respiratory disabilities on not being able to carry their property to the (Shake-down) area resulted in me re-injuring my left-shoulder and cervical spine area on May 23, 2018. In violation of (TDCJ-CID) AD.10.20 and ED. 10.61 Safety Policies, and 42 U.S.C.A. 12102(1),(2) Americans with Disabilities Act,cruel and unusual punishment.

3. I am incorporating my step one grievance complaint in to this step two appeal. In I am requesting that a further inquisition be conducted in to my complaint.

Attachment-Step One Grievance.

cc/jps

I-128 Front (Revised 11-2010)

YOUR SIGNATURE IS REQUIRED ON BACK OF THIS FORM

(OVER)

Mr. Jesse P. Skinner
TDCJ# 599362/Eastham
2665 Prison Rd.#1
Lovelady, Texas 75851

December 17, 2018

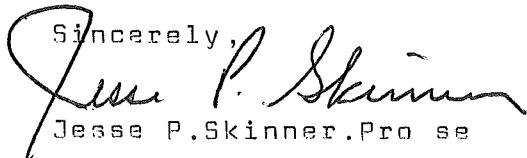
Office of the Clerk
United States District Court
of Texas Eastern District
104 North Third Street
Lufkin, Texas 75901

RE: Jesse P. Skinner V. Bryan Collier, et al Case No. 9:18-00139.
Plaintiff's Motion To Amend Complaint:

Dear Clerk,

Please find enclosed original and one copy of Plaintiff's Motion To Amend Complaint to add Parties and Request for Jury Demand. File all material with the Court for consideration.

I thank you for your time and assistance with this matter.
I await your response. I Remain.

Sincerely,

Jesse P. Skinner. Pro se

enclosure/file

Mr. Jesse P. Skinner
TDCJ# 599362/Eastham
2665 Prison Rd.#1
Lovelady, Texas 75851

NORTH TEXAS TX PSDC

DALLAS TX 750

MAILING CLASSIFICATION



RE 430
RE 430
Clerk of the Court
United States district Court
Eastern district of Texas
104 North Third Street
Lufkin, Texas 75901

75901-983135

[REDACTED]